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**BARRICK**

**BARRICK RESOURCES (USA), INC.**

May 28, 1992

**RECEIVED**

MAY 29 1992

DIVISION OF  
OIL GAS & MINING

Mr. Donald A. Ostler  
Director, Division of Water Quality  
State of Utah Department of Environmental Quality  
P.O. Box 144870  
Salt Lake City, Utah 84114-4870

Dear Mr. Ostler:

SUBJECT: Barrick Resources (USA), Inc. Comments to Proposed  
Groundwater Quality Discharge Permit, No. UGW 450002

Barrick has reviewed the draft Groundwater Quality Discharge Permit for its Reservoir Canyon Tailings Impoundment as publicly noticed on May 4, 1992 and provided to us by your letter of May 15, 1992.

We find the draft permit acceptable with the following comment:

The last sentence of paragraph III.E. "Proper Operation and Maintenance" on page 21 of the draft permit remains ambiguous. Barrick is concerned that this sentence may be read by someone in the future to require a backup or auxiliary INCO SO<sub>2</sub>/O<sub>2</sub> tailings treatment system.

To date, the state has not required and Barrick cannot agree to the installation of such a backup system. As you are aware, the effluent from the INCO SO<sub>2</sub>/O<sub>2</sub> system goes to the tailings impoundment and is not directly discharged to surface or groundwater. There is no evidence to show that even if a breakdown occurs and untreated mill tailings are temporarily pumped to the tailings impoundment to be mixed with the existing tailings, there would be any environmental impact. Any problems associated with the cyanide removal system can be dealt with under the permit provisions including those dealing with upset and bypass. Barrick is prepared to meet the substantive provisions of the groundwater permit, but redundant and unnecessary cyanide treatment facilities cannot be justified and must not be required.

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We request that the following sentence be added at the end of paragraph III.E.: This provision shall not be read to require the installation of a backup or auxiliary INCO SO<sub>2</sub>/O<sub>2</sub> tailings treatment system for cyanide removal from mill tailings prior to their discharge to the tailings impoundment."

Very truly yours,



Frank D. Wicks  
Vice President and General Manager

FDW/cg

cc: Myron Bateman (Tooele County Health)  
Dave Bird (Parsons Behle & Latimer)  
Lowell Braxton (Utah D.O.G.M.)  
Fred Nelson (Utah Attorney General's Office)

G. M. Eurick  
T. B. Faddies  
C. L. Landa  
C. L. Olsen  
M. P. Richardson  
R. R. Sacrison